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IN THE CIRCUIT COURT FOR BALTIMORE CITY

2019 DEC 3 AM 11:40

CIRCUIT COURT
BALTIMORE CITY
CRIMINAL DIVISION

STATE OF MARYLAND

v.

KEVIN LAMONT HICKSON



D.O.B.: 06/15/1970 SID: 1595271

Tracking Number: 177024004883

(TRUE BILL)

GRAND JURY FOREPERSON

FILED: December 3, 2019

CHARGES:

Conspiracy to Maintain and Promote Criminal Organization by Unlawful Means (Common Law; Maryland Criminal Law Article §§ 1-202; 1-203)

Manage a Criminal Gang (Maryland Criminal Law Article § 9-805)

Conspiracy to Participate in Gang (Maryland Criminal Law Article § 9-804(d))

Participation in Gang (Maryland Criminal Law Article § 9-804(a))

Assault – 2nd Degree Assault (Maryland Criminal Law Article § 3-203)

Conspiracy to Commit Second-Degree Assault (Common Law; Maryland Criminal Law Article § 3-203)

Misconduct in Office (Common Law)

Conspiracy to Commit Misconduct in Office (Common Law)

WITNESSES:

Det. Norval Cooper
Department of Public Safety and Correctional Services
Special Operations Unit

Det. George Cannida
Department of Public Safety and Correctional Services
Special Operations Unit

CO-DEFENDANTS:

State of Maryland

v.

**Kenyatta BARRETT
Davon BUISE
Britian BUTLER
Ronald CRAWFORD
Jarrell DOCKETT
Eugene EARLY
Lance HATHAWAY
Kemar HINES
Teron KNIGHT
Dorian PAREDES
Pawan RAI
Damon RHUE
Darnell SLACUM
Gerald SOLOMON
Ian STEWART
Jerry SUBER
Davon TELP
Corey THIESS
Carlos THOMAS
Carlton THOMPSON
Aaron TOPORCZYK
Uchenna UMEOKAFOR
Donte WILLIAMS
Monte WILLIAMS**

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Tracking no. 177024004964
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Tracking no. 177024005056
Tracking no. 177024005174
Tracking no. 177024005104
Tracking no. 177024005093
Tracking no. 177024005001
Tracking no. 177024005060
Tracking no. 177024005141
Tracking no. 177024005126
Tracking no. 177024005185
Tracking no. 177024005163
Tracking no. 177024005082
Tracking no. 177024005071
Tracking no. 177024005045**

STATE OF MARYLAND

* IN THE

v.

* CIRCUIT COURT

Kevin HICKSON

* FOR BALTIMORE CITY

*

Defendant

* CASE NO: 19337008

INDICTMENT

The Grand Jurors for the State of Maryland for Baltimore charge:

COUNT ONE

**(COMMON LAW CONSPIRACY TO MAINTAIN AND PROMOTE
CRIMINAL ORGANIZATION BY UNLAWFUL MEANS)**

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that, from at least March 25, 2016 through September 4, 2019, in various correctional facilities in the State of Maryland, the aforesaid **DEFENDANT**, with other persons whose names are known and unknown to the Jurors, did knowingly, intentionally, and unlawfully conspire, confederate, combine, and agree to maintain, further, facilitate, enrich, promote, and protect a criminal enterprise that operated as its main hub the area in and around the following correctional facilities: Metropolitan Transition Center, Baltimore Central Booking and Intake Center, and Baltimore City Detention Center Jail Industries Building, all located in Baltimore City, Maryland, and Jessup Correctional Institution located in Anne Arundel County, Maryland, by unlawful criminal means including, but not limited to, assault in the first and second degrees, intimidation of witnesses, obstruction of justice, and acts of violence, in violation of the Common Law of Maryland; against the peace, government, and dignity of the State.

Background

1. The Department of Public Safety and Correctional Services (DPSCS) is one of the largest agencies in the State of Maryland with nearly 12,000 employees and a budget of more than \$1 billion, whose jurisdiction covers the entire State of Maryland, which has a population of more than 6 million people. DPSCS operates 27 institutions, including Baltimore City's pre-trial facility, as well as 45 Parole and Probation offices throughout the state.

2. DPSCS is primarily tasked with ensuring safety so that all Marylanders can enjoy living and working in the State. This task is achieved by ensuring security in DPSCS institutions and supplying offenders and former-offenders the tools necessary to stay out of the criminal justice system.

3. The Baltimore Central Region Tactical Unit (TAC) is a specialized unit within the DPSCS Division of Pretrial and Detention Services, which reports directly to the Commissioner and the Deputy Commissioner of DPSCS Pretrial. According to their mission statement, TAC:

is to respond to critical and routine incidents to mitigate disorder, protect the community, employees and arrestees/detainees/inmates in the department's custody and support line staff to maintain order and security of all facilities under the Division of Pretrial Detention and Services.

4. Further, TAC's vision statement dictates:

that through constant and rigorous training planning and intelligence gathering regimen, the DPSCS TAC Team will provide the best premium quality support service available. It is our team goal to train hard, train often and execute at a level that far exceeds the industry standard.

5. TAC members identify themselves by, among other things, wearing unique uniforms, including t-shirts, hats and other accessories, and displaying TAC insignia patches and logos on their uniforms.

6. The TAC team primarily maintained their headquarters at the Jail Industries Building located in Baltimore City, Maryland.

7. The TAC team has a paramilitary command structure that consists of a TAC commander, assistant commanders stationed at the institutions where TAC operates, TAC team leaders, and TAC team members.

8. The TAC team members are associates with one of five team groups:

- A. Contraband/Paperwork Team
- B. Squad 1 (Rapid Response)
- C. Squad 2 (Strip Search/Tactical)
- D. Squad 3 (Tactical/Search)
- E. Squad 4 (Search/Tactical)

9. The TAC team has a specific operational territory which consists of, in pertinent part, the following detention facilities:

- A. Metropolitan Transition Center (MTC)
- B. Baltimore Pretrial Facility at Jessup Correctional Institute (BPFJ)
- C. Jail Industries Building (JI)
- D. Baltimore City Booking and Intake Center (BCBIC)

10. The TAC commander is Lt. (now acting Capt.) Kevin HICKSON. Hickson is a founding member of TAC. Hickson is also the organizer, supervisor, promoter, and manager of the Enterprise that exists within TAC.

11. The Enterprise is specifically comprised of the Defendants and others known and unknown to the Grand Jury. The Enterprise consists of individuals who are high-ranking members, who direct, manage, and supervise the lower-ranking members, and who oversee the day-to-day operations of the group. The members and associates of the Enterprise generally have specific roles and directives within the organization. The members and associates sometimes work different shifts, with some members working in the early hours of the day, and some members not beginning until the evening.

12. The purpose of the Enterprise is to maintain its dominance in its operational territory. To achieve this purpose, the Enterprise engages in illegal and excessive force through assaults of inmates, use of threats against inmates, and various retaliatory tactics to assure complete compliance with TAC's authority, which bolsters TAC's overall reputation within the territory and suppresses any dissention and discord among the overall prison population.

13. The Enterprise has committed and is continuing to commit acts of violence and intimidation—including violent assaults, witness intimidation and tampering, destruction of evidence, alteration of evidence, falsification of official public documents, and obstruction of justice—in order to maintain dominance of its operational territory, enhance its reputation, and shield its members and operations from law enforcement. Participating in these acts either directly or indirectly, will often earn individuals the respect of their fellow members, and will secure, maintain, and advance their position in the Enterprise.

Manner, Means, and Methods of the Conspiracy

14. The Enterprise seeks, among other things, to build a reputation as a premier unit within DPSCS in order to separate themselves from other units. The manner, means, and methods by which the defendants and their associates achieve the objectives of the conspiracy include, but are not limited to, the following:

15. Members and associates of the Enterprise do, individually and collectively, use excessive force while on tactical missions in order to bolster their reputation among inmates and other correctional officers.

16. Members and associates of the Enterprise do, individually and collectively, cover up their illegal/improper actions by falsifying documents, falsifying statements, tampering with and fabricating evidence, and witness intimidation through threats of retaliation.

17. Members and associates of the Enterprise generally permit only other members and associates of their unit to be present during the application of the excessive force and various other illegal activity.

18. Members and associates of the Enterprise utilize social media to broadcast, promote, and advertise their reputation and successes. They post group photos displaying the success of the unit and proudly proclaim their membership in the Enterprise.

19. Members and associates of the Enterprise use verbal and nonverbal communication during the commission of the Enterprise's illegal activities, including winks, nods and other body language, to warn each other about the presence of non-members or officials charged with oversight, as well as to communicate with those interested in engaging in the illegal assaults of inmates.

20. Members and associates of the Enterprise alert other members about the covert or overt presence of DPSCS oversight investigators or non TAC members in the area, and will attempt to conceal criminal acts if they believe they are under observation or surveillance, in order to prevent detection and intervention by law enforcement.

21. Members and associates of the Enterprise will obstruct justice, and threaten and intimidate individuals whom the organization suspects have cooperated with law enforcement.

Overt Acts in Furtherance of the Conspiracy

22. In furtherance of the conspiracy and to achieve the objectives thereof—and for the benefit of, at the direction of, and in association with the Enterprise—the Defendants, as named below, and others known and unknown, knowingly and willfully directed, participated in, performed, and caused to be performed the following acts, among others, in and throughout Maryland, including in Baltimore City and Anne Arundel County, and elsewhere:

23. On March 25, 2016, Lt. (now acting Capt.) Kevin HICKSON and Cpl. Ronald CRAWFORD conspired with each other and unknown others to commit assault in the second degree and did commit assault in the second degree against Montrell Powell in Jail Industries Building in Baltimore, Maryland.

24. On March 20, 2017, Lt. (now acting Capt.) Kevin HICKSON and Cpl. Dorian PAREDES conspired with each other and unknown others to commit assault in the second degree and did commit assault in the second degree against Rashad Harris in Metropolitan Transition Center in Baltimore, Maryland.

25. On April 10, 2017, Cpl. Eugene EARLY, Cpl. Teron KNIGHT, and Cpl. Aaron TOPORCZYK conspired with each other and unknown others to commit assault in the second degree and did commit assault in the second degree against Contey Dorsey in Jail Industries Building in Baltimore, Maryland.

26. On May 16, 2017, Cpl. Teron KNIGHT and Cpl. Pawan RAI conspired with each other and with both known and unknown others to commit assault in the first degree and did commit assault in the first degree against Teddy Shannon in Jail Industries Building in Baltimore, Maryland.

27. On May 16, 2017, Cpl. Lance HATHAWAY and Cpl. Pawan RAI conspired with each other and unknown others to commit assault in the second degree and did commit assault in the second degree against Stephen Thompson in Jail Industries Building in Baltimore, Maryland.

28. On May 17, 2017, Lt. (now acting Capt.) Kevin HICKSON and Cpl. Carlos THOMAS and Cpl. (now Sgt.) Monte WILLIAMS conspired with each other and with both known and unknown others to commit assault in the second degree and did commit assault in the second degree against Raekwon Commodore in Jail Industries Building in Baltimore, Maryland.

29. On May 19, 2017, Cpl. Kenyatta BARRETT and Cpl. Jerry SUBER conspired with each other and with both known and unknown others to commit assault in the second degree and did commit assault in the second degree against Bryan Thompson in Jail Industries Building in Baltimore, Maryland.

30. On May 19, 2017, Cpl. Lance HATHAWAY conspired with both known and unknown others to commit assault in the second degree and did commit assault in the second degree against Antoine Mayo in Jail Industries Building in Baltimore, Maryland.

31. On September 19, 2017, Cpl. Ronald CRAWFORD and Cpl. Davon TELP conspired with each other and with both known and unknown others to commit assault in the second degree and did commit assault in the second degree against DaSean Harris in Metropolitan Transition Center in Baltimore, Maryland.

32. On September 19, 2017, Lt. (now acting Capt.) Kevin HICKSON and Cpl. Davon TELP conspired with each other and unknown others to commit assault in the second degree and did commit assault in the second degree against Brian Scott in Metropolitan Transition Center in Baltimore, Maryland.

33. On October 4, 2017, Sgt. (now Lt.) Jarrell DOCKETT, Cpl. Davon TELP, and Cpl. (now Sgt.) Monte WILLIAMS, conspired with each other and with both known and unknown others to commit assault in the first degree and did commit assault in the first degree against Andre Rawles in Jessup Correctional Institution in Anne Arundel County, Maryland.

34. On October 4, 2017, Sgt. (now Lt.) Jarrell DOCKETT, Cpl. Davon TELP, and Cpl. (now Sgt.) Monte WILLIAMS conspired with each other and with both known and unknown others to commit assault in the second degree and did commit assault in the second degree against Christopher Wise in Jessup Correctional Institution in Anne Arundel County, Maryland.

35. On January 29, 2018, Cpl. Ronald CRAWFORD and Cpl. Donte WILLIAMS conspired with each other and with both known and unknown others to commit assault in the first degree and did commit assault in the first degree against Antwan Heath in Metropolitan Transition Center in Baltimore, Maryland.

36. On January 29, 2018, Cpl. Kemar HINES and Cpl. Darnell SLACUM conspired with each other and with both known and unknown others to commit assault in the second degree and did commit assault in the second degree against Daquan Johnson in Metropolitan Transition Center in Baltimore, Maryland.

37. On February 1, 2018, Cpl. Damon RHUE and Cpl. Davon TELP conspired with each other and with both known and unknown others to commit assault in the second degree and did commit assault in the second degree against Robbie Hyman in Baltimore Central Booking and Intake Center in Baltimore, Maryland.

38. On February 9, 2018, Lt. (now acting Capt.) Kevin HICKSON and Cpl. Darnell SLACUM conspired with each other and with both known and unknown others to commit assault in the second degree and did commit assault in the second degree against Cliff Frazier in Jessup Correctional Institution in Anne Arundel County, Maryland.

39. On March 8, 2018, Cpl. Pawan RAI and Cpl. Uchenna UMEOKAFOR conspired with each other and with both known and unknown others to commit assault in the first degree and did commit assault in the first degree against Davon Gilmore in Jessup Correctional Institution in Anne Arundel County, Maryland.

40. On March 8, 2018, Cpl. Eugene EARLY, Cpl. Pawan RAI, and Cpl. Ian STEWART conspired with each other and with both known and unknown others to commit assault in the first degree and did commit assault in the first degree against Shamar Scott in Baltimore Central Booking and Intake Center in Baltimore, Maryland.

41. On June 6, 2018, Cpl. Britian BUTLER and Cpl. Kemar HINES conspired with each other and unknown others to commit assault in the second degree and did commit assault in the second degree against Shaymar Barnes in Jessup Correctional Institution in Anne Arundel County, Maryland.

42. On June 29, 2018, Cpl. Britian BUTLER conspired with both known and unknown others to commit assault in the second degree and did commit assault in the second degree against Dewayne Venable in Metropolitan Transition Center in Baltimore, Maryland.

43. On June 29, 2018, Cpl. Davon BUISE conspired together and with known and unknown others to commit assault in the second degree and did commit assault in the second degree against Ryan Scott in Metropolitan Transition Center in Baltimore, Maryland.

44. On June 29, 2018, Cpl. Carlton THOMPSON conspired together and with known and unknown others to commit assault in the second degree and did commit assault in the second degree against Derrick Bryant in Metropolitan Transition Center in Baltimore, Maryland.

45. On July 1, 2018, Sgt. Gerald SOLOMON, Cpl. Britian BUTLER, and Cpl. Teron KNIGHT conspired with each other and unknown others to commit assault in the second degree and did commit assault in the second degree against Darrell Carter in Baltimore Central Booking and Intake Center in Baltimore, Maryland.

46. On July 1, 2018, Sgt. Gerald SOLOMON, Cpl. Britian BUTLER, and Cpl. Teron KNIGHT conspired with each other and unknown others to commit assault in the second degree and did commit assault in the second degree against Jeffrey Nelson-Johnson in Baltimore Central Booking and Intake Center in Baltimore, Maryland.

47. On September 4, 2019, Sgt. Gerald SOLOMON, Cpl. Davon BUISE, and Cpl. Lance HATHAWAY, and Cpl. Corey THIESS conspired with each other and unknown others to commit assault in the second degree and did commit assault in the second degree against Raymond Thornton in Baltimore Central Booking and Intake Center in Baltimore, Maryland.

[Common Law]

COUNT TWO
(MANAGE A CRIMINAL GANG)

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that, beginning in at least as early as March 2016 through September 4, 2019, in the City of Baltimore and Anne Arundel County, **DEFENDANT** did organize, supervise, promote, and manage a criminal gang in violation of the Criminal Law Article, Section 9-805, of the Maryland Code, against the peace, government, and dignity of the State.

Note: the background, manner, means, methods, use of violence, and additional overt acts listed in Count 1 above are incorporated by reference herein.

[CR 9-805] CJIS 1 1393 (formerly 1 0619)

COUNT THREE
(PARTICIPATION IN A CRIMINAL GANG – CONSPIRACY)

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that, aforesaid **DEFENDANT**, late of said City, since at least as early as March 25, 2016 through September 4, 2019, in Baltimore City and Anne Arundel County, Maryland, did conspire with others known and unknown to the Jurors, to participate in a criminal gang, knowing that the members of said gang engage in criminal gang activity and knowingly and willfully directed and participated in an underlying crime for the benefit of, at the direction of, and in association with a criminal gang, referred to herein as the Enterprise, in violation of the Criminal Law Article, Section 9-804(d), of the Maryland Code against the peace, government, and dignity of the State.

Note: the background, manner, means, methods, use of violence, and additional overt acts listed in Count 1 above are incorporated by reference herein.

[CR 9-804(d)] CJIS 1-1395

COUNT FOUR
(PARTICIPATION IN A CRIMINAL GANG)

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that, aforesaid **DEFENDANT**, since at least as early as March 25, 2016 through September 4, 2019, in Baltimore City and Anne Arundel County, along with others known and unknown to the Jurors, did participate in a criminal gang, referred to herein as the Enterprise, knowing that the members of said gang engage in criminal gang activity and knowingly and willfully directed and participated in an underlying crime committed for the benefit of, at the direction of, and in association with a criminal gang, in violation of the Criminal Law Article, Section 9-804(a), of the Maryland Code against the peace, government, and dignity of the State.

Note: the background, manner, means, methods, use of violence, and additional overt acts listed in Count 1 above are incorporated by reference herein.

[CR 9-804(a)] CJIS 1-1394]

COUNT FIVE
(SECOND-DEGREE ASSAULT)

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that, on or about March 25, 2016, in the Jail Industries Building in the City of Baltimore, Maryland, **DEFENDANT** did assault Montrell Powell in the second degree in violation of the Criminal Law Article, Section 3-203, of the Maryland Code, against the peace, government and dignity of the State.

[CR 3-203] CJIS 1 1415

COUNT SIX
(SECOND-DEGREE ASSAULT)

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that, on or about March 20, 2017, in the Metropolitan Transition Center in the City of Baltimore, Maryland, **DEFENDANT** did assault Rashad Harris in the second degree in violation of the Criminal Law Article, Section 3-203, of the Maryland Code, against the peace, government and dignity of the State.

[CR 3-203] CJIS 1 1415

COUNT SEVEN
(SECOND-DEGREE ASSAULT)

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that, on or about May 17, 2017, in the Jail Industries Building in the City of Baltimore, Maryland, **DEFENDANT** did assault Raekwon Commodore in the second degree in violation of the Criminal Law Article, Section 3-203, of the Maryland Code, against the peace, government and dignity of the State.

[CR 3-203] CJIS 1 1415

COUNT EIGHT
(SECOND-DEGREE ASSAULT)

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that, on or about September 19, 2017, in the Metropolitan Transition Center in the City of Baltimore, Maryland, **DEFENDANT** did assault Brian Scott in the second degree in violation of the Criminal Law Article, Section 3-203, of the Maryland Code, against the peace, government and dignity of the State.

[CR 3-203] CJIS 1 1415

COUNT NINE
(SECOND-DEGREE ASSAULT)

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that, on or about February 9, 2018, in the Jessup Correctional Institution in Anne Arundel County, Maryland, **DEFENDANT** did assault Cliff Frazier in the second degree in violation of the Criminal Law Article, Section 3-203, of the Maryland Code, against the peace, government and dignity of the State.

[CR 3-203] CJIS 1 1415

COUNT TEN
(CONSPIRACY – SECOND-DEGREE ASSAULT)

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid **DEFENDANT(s)**, late of said City, heretofore on or about March 25, 2016, in the Jail Industries Building in the City of Baltimore, Maryland, unlawfully alleged to have conspired with Cpl. RONALD CRAWFORD, together and with each other, and with certain other persons whose names are unknown to the Jurors aforesaid, to assault Montrell Powell in the second degree in violation of the common law of Maryland and Criminal Law Article, Section 3-203 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[Common Law; 3-203] CJIS 1 C 1415

COUNT ELEVEN
(CONSPIRACY – SECOND-DEGREE ASSAULT)

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid **DEFENDANT(s)**, late of said City, heretofore on or about March 20, 2017, in the Metropolitan Transition Center in the City of Baltimore, Maryland, unlawfully alleged to have conspired with Cpl. DORIAN PAREDES, together and with each other, and with certain other persons whose names are unknown to the Jurors aforesaid, to assault Rashad Harris in the second degree in violation of the common law of Maryland and Criminal Law Article, Section 3-203 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[Common Law; 3-203] CJIS 1 C 1415

COUNT TWELVE
(CONSPIRACY – SECOND-DEGREE ASSAULT)

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid **DEFENDANT(s)**, late of said City, heretofore on or about May 17, 2017, in Jail Industries Building in the City of Baltimore, Maryland, unlawfully alleged to have conspired with Cpl. CARLOS THOMAS and Cpl. (now Sgt.) MONTE WILLIAMS, together and with each other, and with certain other persons whose names are known and unknown, to assault Raekwon Commodore in the second degree in violation of the common law of Maryland and Criminal Law Article, Section 3-203 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[Common Law; 3-203] CJIS 1 C 1415

COUNT THIRTEEN
(CONSPIRACY – SECOND-DEGREE ASSAULT)

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid **DEFENDANT(s)**, late of said City, heretofore on or about September 19, 2017, in the Metropolitan Transition Center in the City of Baltimore, Maryland, unlawfully alleged to have conspired with Cpl. DAVON TELP, together and with each other, and with certain other persons whose names are unknown to the Jurors aforesaid, to assault Brian Scott in the second degree in violation of the common law of Maryland and Criminal Law Article, Section 3-203 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[Common Law; 3-203] CJIS 1 C 1415

COUNT FOURTEEN
(CONSPIRACY – SECOND-DEGREE ASSAULT)

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid **DEFENDANT(s)**, late of said City, heretofore on or about February 9, 2018, in the Jessup Correctional Institution in Anne Arundel County, Maryland, unlawfully alleged to have conspired with Cpl. DARNELL SLACUM, together and with each other, and with certain other persons whose names are known and unknown, to assault Cliff Frazier in the second degree in violation of the common law of Maryland and Criminal Law Article, Section 3-203 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[Common Law; 3-203] CJIS 1 C 1415

COUNT FIFTEEN
(MISCONDUCT IN OFFICE)

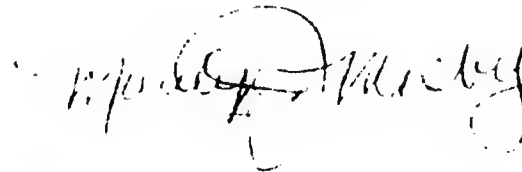
The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that, at least as early as March 25, 2016 through September 4, 2019, in Anne Arundel County, the City of Baltimore, and other Maryland Counties, **DEFENDANT**, being then and there a public officer, to wit: a correctional officer for the Department of Public Safety and Correctional Services, unlawfully, knowingly, and corruptly, did commit a wrongful and improper act under color of his office, to wit: the commission of second degree assault against individuals confined within Maryland Correctional facilities, and as a continuing course of conduct, by failing to report assaults, acts of intimidation, falsification of official documents, and corruption within the TAC organization to the appropriate authorities within the Department of Public Safety and Correctional Services, and by failing to protect the health, safety, and wellbeing of detained inmates within the custody of the Department, in violation of the common law of Maryland against the peace, government, and dignity of the State.

[Common Law]

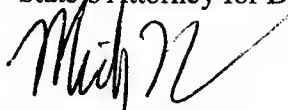
COUNT SIXTEEN
(CONSPIRACY TO COMMIT MISCONDUCT IN OFFICE)

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that, at least as early as March 25, 2016 through September 4, 2019, in the City of Baltimore and in Anne Arundel County, the **DEFENDANT**, being then and there a public officer, to wit: a correctional officer for the Department of Public Safety and Correctional Services, unlawfully, knowingly, and corruptly, did conspire together and with certain other persons whose names are known and unknown to the Jurors aforesaid, a wrongful and improper act under color of his office, to wit: the commission of first and second degree assaults against individuals confined within Maryland Correctional facilities, and as a continuing course of conduct, by failing to report assaults, acts of intimidation, falsification of official documents, and corruption within the TAC organization to the appropriate authorities within the Department of Public Safety and Correctional Services, and by failing to protect the health, safety, and wellbeing of detained inmates within the custody of the Department, in violation of the common law of Maryland against the peace, government, and dignity of the State.

[Common Law]



Marilyn J. Mosby
State's Attorney for Baltimore City



Michael Hudak
Assistant State's Attorney for Baltimore City

INDICTMENT
TRUE BILL

Foreperson

Filed on _____ (2019)

CO-DEFENDANTS:

Kenyatta BARRETT	Tracking no. <u>177024004990</u>
Davon BUISE	Tracking no. <u>177024005130</u>
Britian BUTLER	Tracking no. <u>177024005115</u>
Ronald CRAWFORD	Tracking no. <u>177024004931</u>
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Eugene EARLY	Tracking no. <u>177024004953</u>
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